



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

**ZACHARY W. CARTER**  
*Corporation Counsel*

**ALEXANDRA CORSI**  
*Senior Counsel*  
Phone: (212) 356-2340  
Fax: (212) 356-3509  
Email: [acorsi@law.nyc.gov](mailto:acorsi@law.nyc.gov)

June 6, 2016

BY ECF

Honorable Marilyn D. Go  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Angel Hollins v. City of New York, et al.,  
14 CV 6519 (WFK) (MDG)

Your Honor:

I am a Senior Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to the defense of the above-referenced matter. I write on behalf of defendants to respectfully request a 60-day extension of time, from June 24, 2016 until August 23, 2016, to complete discovery. Plaintiff's counsel, Afsaan Saleem, Esq., consents to this request.

The reason for this request is that, due to an unanticipated personal situation, which the undersigned can relay to the Court *ex parte* if necessary, the undersigned will be out of the office most of the present week, and it is unclear what her work schedule will be for the remaining weeks in June. The parties were scheduled to go forward with the remaining depositions in this case next week, however, because of this unanticipated personal situation, those depositions will have to be rescheduled for either July or August. For the foregoing reasons and due to summer scheduling conflicts, defendants respectfully request a 60-day extension of time, from June 24, 2016 until August 23, 2016, to complete discovery.

Thank you for your consideration regarding the within request.

Respectfully submitted,

/s/

Alexandra Corsi  
Senior Counsel  
Special Federal Litigation Division

cc: BY ECF  
Afsaan Saleem, Esq.  
Attorney for *plaintiff*  
The Rameau Law Firm  
16 Court Street, Suite 2504  
Brooklyn, New York 11241